



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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November 29, 2007

Ms. Mary Gade  
Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Re: Technical Addendum to the Clean Air  
Act Section 110(l) Demonstration for  
Clark and Floyd Counties, Indiana

Dear Ms. Gade:

The Indiana Department of Environmental Management (IDEM) has prepared this technical addendum to the Clean Air Act Section 110(l) Demonstration for Clark and Floyd Counties, Indiana to incorporate Lake Michigan Air Directors Consortium (LADCO) – Round 5 annual PM<sub>2.5</sub> modeling results for the Clean Air Interstate Rule. IDEM submitted this non-interference demonstration to U.S. EPA with a request for parallel processing on October 10, 2006 and a final submission on November 15, 2006 to support the discontinuation of the vehicle inspection and maintenance program in Clark and Floyd Counties.

LADCO Round 5 PM<sub>2.5</sub> modeling results, reliant on 2005 emissions and meteorological data, shows all sites in Clark and Floyd counties and in Bullitt, Hardin and Jefferson Counties in Kentucky have future year modeled design values in 2009, 2012 and 2018 well below the annual fine particles National Ambient Air Quality Standard (15.0 ug/m<sup>3</sup>). This demonstration and all future year modeling scenarios exclude the emission reductions associated with the previous vehicle emissions testing program in place. Table 1.11 (to be considered an addition to the Technical Support Document submitted on November 15, 2006) shows the LADCO – Round 5 annual PM<sub>2.5</sub> modeling results for CAIR.

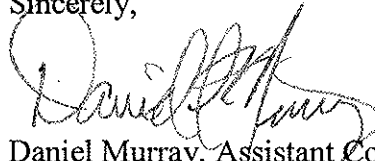
**Table 1.11**  
**LADCO's Round 5 Annual PM<sub>2.5</sub> Modeling Results for the Clean Air Interstate Rule**

Monitor ID	County	State	Design Value 2000-2004	2009 Future Design Value with CAIR	2012 Future Design Value with CAIR	2018 Future Design Value with CAIR
			(ug/m3)	(ug/m3)	(ug/m3)	(ug/m3)
180190006	Clark	Indiana	16.5	13.6	13.6	13.2
180431004	Floyd	Indiana	14.9	12.1	12.0	11.5
210290006	Bullitt	Kentucky	14.9	12.4	12.4	12.0
210930006	Hardin	Kentucky	13.5	11.2	11.2	10.7
211110043	Jefferson	Kentucky	15.7	12.8	12.7	12.1
211110044	Jefferson	Kentucky	15.4	12.8	12.8	12.4
211110048	Jefferson	Kentucky	15.2	12.5	12.5	12.1
211110051	Jefferson	Kentucky	14.7	12.1	12.1	11.7

IDEM believes that this supplemental information in conjunction with the Clean Air Act 110(l) demonstration, provides the necessary weight of evidence to demonstrate that the discontinuation of the vehicle emissions testing program will not interfere with the area's ability to attain the annual PM<sub>2.5</sub> NAAQS by its assigned deadline of April 5, 2010. IDEM also believes that its non-interference demonstration for the year 2007 remains valid, with no adverse impacts evident for the area.

Therefore, IDEM hereby requests that U.S. EPA proceed with final review and approval of the Clean Air Section 110(l) Demonstration for Clark and Floyd Counties. If you have any questions or need additional information, please contact Scott Deloney, Branch Chief, at (317) 233-5684.

Sincerely,



Daniel Murray, Assistant Commissioner  
Indiana Department of Environmental Management

**Attachments**

cc: Jay Bortzer, US EPA  
John Mooney, US EPA  
Scott Deloney, IDEM